

1985. (See Complaint). Accordingly, this civil action is removable under 28 U.S.C. § 1441. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343 because this case involves a federal question.

5. This Court also has supplemental jurisdiction over any perceived state court claims asserted by Plaintiffs in their Complaint pursuant to 28 U.S.C. § 1367.

6. The Florence Division is the proper venue inasmuch as the events in controversy took place within the Florence Division.

7. This Defendant has attached to this Notice and filed herewith copies of pleadings served upon him in this action as required by 28 U.S.C. § 1446 (A). (See Exhibit A.)

8. This Defendant is providing the Plaintiffs and the Clerk of Horry County Court of Common Pleas in South Carolina written notice of the removal of this action as required by 28 U.S.C. § 1446 (D).

9. This Defendant is unaware if the remaining Defendants have yet been served.

WHEREFORE, this Petitioner prays that the above-entitled case be removed to this, the United States District Court for the District of South Carolina, Florence Division.

This the 10th day of June, 2022.

I SO MOVE:

s/ Lisa A. Thomas
Lisa A. Thomas, Fed ID #9950
Thompson & Henry, P.A.
P. O. Box 1740
Conway, South Carolina 29528
Attorney for Defendant Ellenburg